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**REQUEST FOR ADJOURNMENT OF CONFERENCE
ON CONSENT**

April 2, 2024

Honorable Orelia E. Merchant
United States District Court,
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: AutoExpo Ent. Inc., et al. v. Elyahou, et al.,
Case No.: 23-cv-9249
Pre-Motion Conference: April 11, 2024 at 2:30 PM

Dear Honorable Judge Merchant:

Hope this correspondence finds you well. As you are aware this firm represents, Omid Elyahou, and Simpsocial LLC in the aforementioned matter.

Unfortunately, as luck would have it on April 11 2024 I will be engaged in United States District Court, Martin Luther King Building, & US Courthouse, 50 Walnut Street, Newark, NJ 07102 on a multi-defendant criminal matter of *United States v. John Doe*, whereby *John Doe* has agreed to proffer and become a material witness for the government. Obviously due to the nature of the case, I am not at liberty to disclose the name of the defendant, but will gladly provide same in camera if the Your Honor inquires further.

Prior to making this request, pursuant to the Part Rules, I reached out and conferred with respective counsels of record. Respective counsels were all gracious enough to Consent and further provide their availability. Whereby, the parties are all available on April 12, April 15, April 17, April 18, and April 19, 2024.

This is defendant's first request for an adjournment of a conference before Your Honor. Good cause exists for the requested adjournment due to the sensitive nature of the criminal proceeding in New Jersey. Accordingly, it is respectfully requested that the Pre-Motion Conference be adjourned to April 12, April 15, April 17, April 18, and April 19, or any other date convenient to the Court, so long as same does not conflict with the Jewish Holidays of Passover (April 22 to April 30) which many of the parties and attorneys observe.

The Court's time and attention to this matter are greatly appreciated. I apologize for any, and all inconveniences caused by this request.

Respectfully submitted,
Matin Emouna
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TO: ALL COUNSEL OF RECORD
VIA ECF